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UNITED STATES DISTRICT COURT  
DISTRICT OF THE NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,

**Plaintiff,**

No.: CR 08-00017

v

DOMINIC CHPTWELONG, *et al.*,

### Defendants

**STIPULATED MOTION TO  
CONTINUE DEADLINE FOR  
PRE-TRIAL MOTIONS**

The United States and Defendants Dominic Chptwelong, Masaioshy Daikichi Sallem and James Ochcha, by and through undersigned counsel, respectfully move this Court to continue the deadline for pre-trial motions in the above-captioned matter, which is currently set for May 29, 2008, until Monday, June 23, 2008. The extension is necessary, in order for the parties to have sufficient time to obtain and review any transcripts, and to file any necessary, pre-trial motions in this cause. Additionally, counsel for Defendant Ochcha, Robert Torres, will be off-island from June 12, 2008, through June 18, 2008.

Given the imminence of the current pre-trial motions deadline, the government is attempting to make special arrangements to obtain any transcripts on an expedited, rolling basis. The relatively short turn-around time, a backlog of orders of at least three weeks at the court reporting service customarily used by the government, and related concerns have limited transcription options to a

1 court-reporting service on Hawaii. Despite concerted efforts by counsel for the government, at  
2 present it is questionable whether data could be transmitted to Hawaii, transcribed and returned to  
3 Saipan in time for counsel to meet the present pre-trial motions deadline.

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5 Respectfully submitted this 21st day of May, 2008.

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George L. Hasselback  
9 Attorney for Dominic Chptwelong

5/21/08  
Date

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11 Steven P. Pixley  
12 Attorney for Masirosy Daikichi Sallem

5/21/08  
Date

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Robert T. Torres  
14 Attorney for James Ochcha

5/21/08  
Date

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